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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRES AARON CASTRO,

Defendant.

CASE NO. 2:23-CR-00270 TLN

STIPULATION REGARDING RESETTING OF
STATUS CONFERENCE AND EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: May 23, 2024,
TIME: None
COURT: Hon. Troy L. Nunley

STIPULATION

The United States of America, by and through Special Assistant United States Attorney Caily Nelson, together with Kellan Patterson, counsel for defendant Andres Aaron Castro, hereby stipulate as follows:

1. The Indictment was returned on October 19, 2023, and the Honorable Troy L. Nunley.
2. By previous stipulation and order, the matter was continued with an exclusion of time, under Local Code T4 from October 26, 2023, to January 11, 2024.
3. By previous stipulation and order, the matter was continued with an exclusion of time, under Local Code T4 from January 11, 2024, to February 15, 2024.
4. Parties appeared before the Court on February 15, 2024. The court was advised that the parties had entered into a protective order which resulted in a production of documents and information for defendant's review. The matter was continued with an exclusion of time, under Local Code T4 from

February 15, 2024, to March 14, 2024.

5. By previous stipulation and order, the matter was continued with an exclusion of time under Local Code T4 from March 14, 2024, to May 23, 2024.

6. By this stipulation, the defendant, through counsel, move to set the status conference on **July 18, 2024, at 9:30 a.m.**

7. The government and the defendant, through counsel, agree and stipulate, and request that the Court find the following:

a) The government has produced discovery including law enforcement reports, lab reports, search warrants, photographs, and pursuant to a protective order, video and audio recordings. Much, if not all, of the additional discovery provided pursuant to the protective order is in Spanish.

b) Counsel desires additional time to consult with his client, to review and copy discovery for this matter, and to otherwise prepare for trial.

c) Counsel believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and each defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 23, 2024, to July 18, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at each defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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8. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 22, 2024

PHILLIP A. TALBERT
United States Attorney

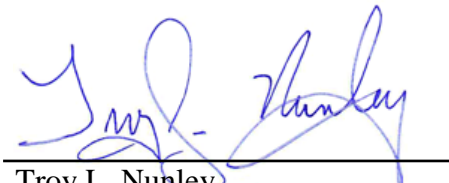
/s/ CAILY NELSON
CAILY NELSON
Special Assistant United States Attorney

Dated: May 22, 2024

/s/ KELLAN PATTERSON
KELLAN PATTERSON
Counsel for Defendant
ANDRES AARON CASTRO

ORDER

IT IS SO FOUND AND ORDERED this 22nd day of May, 2024.



Troy L. Nunley
United States District Judge